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Attorneys for Defendants  
 IRWIN S. ROTHENBERG and  
 PISENTI & BRINKER LLP

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

CHARLES O. BRADLEY TRUST, LINDA L.  
 BRADLEY TRUST, KEN & SHARON BURGE  
 TRUST, BRAD MARTIN BURGE, SCOTT &  
 NOA L. DYKSTRA, RONALD C. HALL,  
 RENTAL CENTER PROPERTIES, a California  
 Partnership,

Plaintiffs,

vs.

ZENITH CAPITAL LLC; TASKER COOPER  
 SMITH/ZENITH GROUP LTD;  
 TASKER COOPER SMITH/ZENITH GROUP  
 LLC; PISENTI & BRINKER LLP;  
 RICK LANE TASKER, (aka Rick Tasker);  
 MARTEL JED COOPER (aka Jed Cooper);  
 GREGG SMITH; IRWIN S. ROTHENBERG (aka  
 Irv Rothenberg); and DOES 1 through  
 50, inclusive,

Defendants.

CASE NO. C 04 2239 JSW (EMC)

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING HEARING ON  
 MOTION TO COMPEL DEFENDANT  
 ROTHENBERG TO PRODUCE  
 DOCUMENTS**

**DATE: December 21, 2005**

**TIME: 10:30 A.M.**

**PLACE: Courtroom C**

**Edward M. Chen**

**STIPULATION**

Plaintiffs Charles O. Bradley Trust, et al. ("Plaintiffs"), by and through one of their  
 attorneys of record, Gerald L. Williams, Esq., and Defendant Irwin S. Rothenberg  
 ("Rothenberg") by and through one of his attorneys of record, Kyle M. Fisher, Esq., hereby

1 stipulate as follows:

2 1. The motion to compel the production of documents by Rothenberg filed by  
3 Plaintiffs (the "Motion") is currently scheduled to be heard on December 21, 2005.

4 2. Due to counsel for Rothenberg's unavailability on December 21, 2005, the parties  
5 have agreed to continue the hearing date on the Motion to January 4, 2006.

6 3. The parties have agreed that Rothenberg's opposition to the Motion shall be due  
7 on or before December 2, 2005.

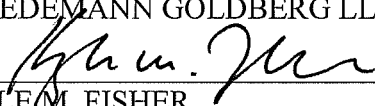
8 4. The parties have agreed that Plaintiffs' reply in support of the Motion shall be  
9 due on or before December 16, 2005.

10 5. On September 7, 2005, Plaintiffs' counsel inspected at the offices of  
11 Rothenberg's counsel documents listed on Rothenberg's privilege log which were redacted to  
12 omit the names of clients, the amounts of their investments in Global Money Management  
13 ("GMM") and information related to investments other than in GMM (the "Redacted Format").  
14 The inspection was made without a waiver of Rothenberg's right to object to the production of  
15 the documents. The parties have agreed that the Motion seeks to compel the production of the  
16 documents inspected by counsel for Plaintiffs on September 7, 2005 and any other documents in  
17 Rothenberg's possession related to clients who invested in GMM in the Redacted Format only.

18 IT IS SO AGREED.

19 DATED: November 28, 2005

FRIEDEMANN GOLDBERG LLP

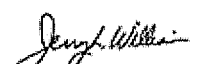
  
KYLE M. FISHER

Attorneys for Defendants

IRWIN S. ROTHENBERG and PISENTI &  
BRINKER LLP

24 DATED: November 28, 2005

JOHNSON & MISKEL

  
GERALD WILLIAMS

Attorneys for Plaintiffs

CHARLES O. BRADLEY TRUST, LINDA L.  
BRADLEY TRUST, KEN & SHARON BURGE  
TRUST, BRAD MARTIN BURGE, SCOTT &  
NOA L. DYKSTRA, RONALD C. HALL, RENTAL  
CENTER PROPERTIES, a California Partnership

**PROPOSED ORDER**

The Court having read and considered the Stipulation of the parties and good cause appearing therefore, hereby orders as follows:

1. The hearing on Plaintiffs' Motion to Compel Production of Documents by Defendant Rothenberg (the "Motion") currently scheduled for December 21, 2005 is continued to January 4, 2006 at 10:30 a.m. in Courtroom "C" of this Court.
2. Any opposition to the Motion shall be due on or before December 2, 2005.
3. Any reply in support of the Motion shall be due on or before December 16, 2005.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE

